

1 IAN G. LOVESETH  
Attorney at Law (CSBN 085780)  
2 819 Eddy Street  
San Francisco, CA  
3 Tel: (415) 771-6174  
Fax: (415) 474-3748

4 Attorney for Defendant  
5 SARAH A ROPATI

6 UNITED STATES DISTRICT COURT  
7 NORTHERN DISTRICT OF CALIFORNIA  
8 SAN FRANCISCO DIVISION

9 UNITED STATES OF AMERICA ) No. CR-07-00645-MMC  
10 )  
11 )

11 Plaintiff,

**EX PARTE APPLICATION TO PERMIT  
DEFENDANTS IN CUSTODY TO REVIEW  
DISCOVERY ON MP3 MACHINES;  
PROPOSED ORDERS**

12 )  
13 )  
14 RONALD WILLIAMS, et al, )  
15 )

15 Defendants.  
16 )  
17 )

17 Ian Loveseth, counsel for defendant Sarah A. Ropati, and CJA liaison counsel for all defendants  
18 and their counsel in this case, hereby applies for an Order permitting all in-custody defendants to  
19 review discovery on an MP3 machine. This application is based on the files and records in this  
20 case and the accompanying declaration of counsel.  
21  
22

23 DATED: March 10, 2008

/s/ Ian Loveseth  
IAN LOVESETH  
Counsel for Defendant  
SARAH A. ROPATI

**DECLARATION OF COUNSEL**

I, Ian Loveseth, declare as follows:

1. I am counsel for Sarah A. Ropati in Untied States vs. Ronald Williams, et al.,  
CR. 07-00645-MMC;

2. I am also liaison CJA counsel in this case;

3. I have been advised by Steven D. Moore, the discovery coordinator in this case, that  
the discovery consists of approximately 35,000 intercepted wiretap calls on eight (8) different  
target lines;

4. The defendants in this case must listen to and review the discovery and the most  
efficient way to provide them with these calls in to put them on MP3s;

5. Accordingly, declarant requests that two Court orders be signed permitting  
defendants at the Santa Rita Jail and at the Glen Dyer Detention Facility to listen to the discovery  
on MP3s.

I declare under penalty of perjury that the above is true and correct to the best of my  
knowledge. Executed in San Francisco on March 10, 2008.

/s/ Ian Loveseth  
IAN LOVESETH

1 IAN G. LOVESETH (CSBN 085780)  
Attorney at Law  
2 819 Eddy Street  
San Francisco, CA  
3 Tel: (415) 771-6174  
Fax: (415) 474-3748

4 Attorney for Defendant  
5 SARAH A ROPATI

6 UNITED STATES DISTRICT COURT  
7 NORTHERN DISTRICT OF CALIFORNIA  
8 SAN FRANCISCO DIVISION

9 UNITED STATES OF AMERICA ) No. CR-07-00645-MMC  
10 )  
11 Plaintiff, ) [PROPOSED] ORDER PERMITTING  
12 ) DEFENDANTS TO USE MP3  
13 v. ) AUDIO PLAYERS TO REVIEW  
14 RONALD WILLIAMS, et.al., ) DISCOVERY AT SANTA RITA JAIL  
15 )  
16 Defendants. )  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

///

1 Finding good cause shown, as discovery has been provided in digital audio format:

2 IT IS HEREBY ORDERED that the following defendants be permitted to use an MP3  
3 player in order to review audio discovery at Santa Rita Jail;

4 BARRY LYNN SAMUEL,

5 ELEAZOR MORA-ARCIGA,

6 SALVADOR ORTEGA,

7 ERIKA MANZO,

8 JAVIER ULISES ZAMORA-HERNANDEZ,

9 ALFREDO GONZALEZ GOVEA,

10 CESAR RAMIREZ-CHAVIRA,

11 MIGUEL RAMIREZ.

12  
13 IT IS SO ORDERED.

14  
15 Dated: \_\_\_\_\_

16 THE HONORABLE MAXINE M. CHESNEY  
United States District Judge

1 IAN G. LOVESETH (CSBN 085780)  
Attorney at Law  
2 819 Eddy Street  
San Francisco, CA  
3 Tel: (415) 771-6174  
Fax: (415) 474-3748

4 Attorney for Defendant  
5 SARAH A ROPATI

6 UNITED STATES DISTRICT COURT  
7 NORTHERN DISTRICT OF CALIFORNIA  
8 SAN FRANCISCO DIVISION

9 UNITED STATES OF AMERICA ) No. CR-07-00645-MMC  
10 )  
11 Plaintiff, ) [PROPOSED] ORDER PERMITTING  
12 ) DEFENDANTS TO USE MP3  
13 v. ) AUDIO PLAYERS TO REVIEW  
14 RONALD WILLIAMS, et.al., ) DISCOVERY AT GLENN DYER  
15 ) DETENTION FACILITY  
16 Defendants. )  
The Honorable Maxine M. Chesney

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27 ///  
28

1 Finding good cause shown, as discovery has been provided in digital audio format:

2 IT IS HEREBY ORDERED that the following defendants be permitted to use an MP3  
3 player in order to review audio discovery at Glenn Dyer Detention Facility, Oakland, CA (North  
4 County);

5 RONALD WILLIAMS,

6 JOSE JUAN PENALOZA-HILARIO,

7 SAMUEL ARANDA,

8 MICHAEL JOSEPH SILVA,

9 RONALD LEE HINES,

10 JOSE ANTONIO CAMACHO-MENDEZ,

11 EDWARD LEROY MOORE.

12  
13 IT IS SO ORDERED.

14  
15 Dated: \_\_\_\_\_

\_\_\_\_\_  
16 THE HONORABLE MAXINE M. CHESNEY  
United States District Judge